

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

(1) ANDREW CHABALLA, as  
Next of Kin of LAVERNE  
SOMERS, Deceased, and  
ANDREW CHABALLA as  
Administrator of the Estate of  
LAVERNE SOMERS

Plaintiffs,

v.

Case No. 5:22-cv-00772-F

(1) SP HEALTHCARE  
MANAGEMENT LLC  
  
(2) MIDWEST GERIATRIC  
MANAGEMENT, LLC  
  
(3) JUDAH BIENSTOCK

Defendants.

**DEFENDANTS' FINAL WITNESS LIST**

COME NOW Defendants, SP Healthcare Management, LLC, Midwest Geriatric Management, LLC, and Judah Bienstock, collectively, "Defendants" and respectfully submit this final Witness list. Defendants reserve the right to add witnesses until discovery closes.

<b><u>Witness</u></b>	<b><u>Anticipated Testimony</u></b>
1. Andrew Chaballa	<b><u>Deposed.</u></b>

2. Alisha Tapp	Facts and circumstances surrounding the visitation by Plaintiff to his mother and background information on Plaintiff.
3. Laura Sherman	Facts and circumstances surrounding the life of Laverne Somers.
4. Linda Sherman	Not deposed. Facts and circumstances surrounding the life of Laverne Somers.
5. Boucher, Lindsey	<b>Deposed.</b> Care and treatment provided to Laverne Somers, and circumstances surrounding the care and treatment of Laverne Somers.
6. Hopkins, Judith	<b>Deposed.</b> Care and treatment provided to Laverne Somers, and circumstances surrounding the care and treatment of Laverne Somers.
7. Tammy Privett	<b>Deposed.</b> Care and treatment provided to Laverne Somers, and circumstances surrounding the care and treatment of Laverne Somers.
8. Adam Young	Facts and circumstances surrounding SP Healthcare, LLC and treatment of Laverne Somers.
9. Bridgett Dawson	Facts and circumstances surrounding SP Healthcare, LLC and treatment of Laverne Somers.
10. Helen Manganya	Facts and circumstances surrounding SP Healthcare, LLC and treatment of Laverne Somers.
11. Carleesha Kirk/Moore	Facts and circumstances surrounding SP Healthcare, LLC and treatment of Laverne Somers.

12. Cynthia Colquitt	Facts and circumstances surrounding SP Healthcare, LLC and treatment of Laverne Somers.
13. Judah Bienstock	Facts and circumstances regarding corporate structure.
14. Melissa Bettis	Testimony regarding SP Healthcare Management, LLC and relationship with MGM.
15. Shana Martin	Director of nursing testimony regarding SP Healthcare Management, LLC
16. Director of Nursing, SP Healthcare Management, LLC	Director of nursing testimony regarding SP Healthcare Management, LLC
17. Administrator of SP Healthcare Management, LLC.	Testimony regarding background and operation of SP Healthcare Management, LLC
18. Edana Stroberg, DO	Testimony surrounding the Death Certificate
19. John Kirby, MD	Expert testimony regarding care and treatment provided to decedent.
20. Suzanne Frederick, MSN, RN-BC, CWCN	Expert testimony regarding care and treatment provided to decedent.
21. Robert Kelly, MD	Expert testimony regarding care and treatment provided to decedent.
22. Charles Bogie III, MD.	Facts and circumstances regarding Ms. Somers's health care and treatment/eye surgery.
23. Shideh Khodaddian, D.O.	Testimony regarding the deceased's medical condition, care, and treatment at Integris.
24. Carrie J. Clark, D.O.	Testimony regarding the deceased's medical condition, care, and treatment at Integris.
25. Samantha Curran	Testimony regarding the deceased's medical condition, care, and treatment at Integris.
26. Drew Cooper, MD	Testimony regarding the deceased's medical condition, care, and treatment of Ms. Somers.
27. Matthew R. Whittaker, D.O.	Testimony regarding the deceased's medical condition, care, and treatment of Ms. Somers.
28. Any and all staff from Integris that provided treatment to Laverne Somers	Testimony regarding the deceased's medical condition, care, and treatment of Ms. Somers.
29. Any and all staff from Southwest Medical Center that provided care and treatment to Laverne Somers	Testimony regarding the deceased's medical condition, care, and treatment of Ms. Somers.

30. Any custodian of Records as necessary for authentication and/or certification of records or exhibits.	.
31. All witnesses identified by any other party and not objected to by Defendants.	
32. Rebuttal witnesses as necessary	

**DOERNER, SAUNDERS, DANIEL  
& ANDERSON, L.L.P.**

*s/Brian M. Keester*

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**Certificate of Service**

I hereby certify that on April 8, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

*s/Brian M. Keester*

Brian M. Keester

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